

1 KAMALA D. HARRIS
Attorney General of California
2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 SUSANA A. GONZALES
Deputy Attorney General
4 State Bar No. 253027
1515 Clay Street, 20th Floor
5 P.O. Box 70550
Oakland, CA 94612-0550
6 Telephone: (510) 622-2221
Facsimile: (510) 622-2270
7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. *2012-84*

13 **CONNIE RASMUSSEN WILKINSON,**
a.k.a. **CONNIE SUE RASMUSSEN, a.k.a.**
14 **CONNIE SUE HICKMAN**
1661 E. Big Rock Road
Tucson, AZ 85718
Registered Nurse License No. 275797

A C C U S A T I O N

Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

23 2. On or about March 31, 1977, the Board of Registered Nursing issued Registered
24 Nurse License Number 275797 to Connie Rasmussen Wilkinson, also known as Connie Sue
25 Rasmussen, also known as Connie Sue Hickman (Respondent). The Registered Nurse License
26 expired on April 30, 2009, and has not been renewed.

1

2

5

9

4

8

9

0

2

3

4

1 COST RECOVERY

2 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case.

6 CAUSE FOR DISCIPLINE

7 (Unprofessional Conduct – Out of State Discipline)
8 (Bus. & Prof. Code § 2761, subd. (a)(4))

9 9. Respondent has subjected her registered nurse license to disciplinary action under
10 Code section 2761, subdivision (a)(4), in that on or about November 18, 2009, in a disciplinary
11 action before the Arizona State Board of Nursing (Arizona Board), Order No. 0810005, the
12 Arizona Board entered an Order revoking Respondent's Arizona registered nurse license.

13 10. The underlying conduct supporting the Arizona Board's disciplinary order is that on
14 or about October 8, 2008, the Board received information from a newspaper that criminal charges
15 had been filed against Respondent. The charges were related to theft from an employer and her
16 sentencing was pending in Tucson, Arizona. Based upon this information, the Board began an
17 investigation. It was discovered that on or about October 2, 2008, an Information was filed in the
18 United States District Court, District of Arizona, Tucson, Arizona, case number CR 08-1235-
19 TUC-DCB (JCG), charging Respondent with theft of public money, mail fraud, and wire fraud,
20 felonies. Respondent failed to report to the Arizona Board within 10 days of the charges being
21 filed that she had been charged with felonies, as required by Arizona statute and rule.

22 11. On or about June 15, 2009, in the United States District Court, District of Arizona,
23 Tucson, Arizona, case number CR 08-1235-TUC-DCB (JCG), Respondent was convicted by
24 guilty plea of wire fraud, a class C felony; mail fraud, a class C felony; and theft of public money,
25 a class C felony. Respondent was committed to a term of imprisonment followed by a period of
26 supervised release. Respondent was also ordered to pay \$325,585.51 in restitution and to
27 participate in substance abuse treatment. Respondent failed to report to the Arizona Board that
28

1 she was convicted of felonies within 10 days of her convictions, as required by Arizona statute
2 and rule.

3 12. On or about October 10, 2008, Arizona Board staff mailed Respondent an
4 "Investigative Questionnaire" regarding the criminal charges filed against her related to theft
5 from an employer, for which sentencing was pending in Tucson, Arizona. On this same date,
6 Respondent was also mailed an "Arrest and Conviction Questionnaire," with instructions to
7 provide a written explanation and specific court and police records regarding each of her arrests,
8 citations, or charges, by October 24, 2008. Respondent was notified that failure to cooperate with
9 the Arizona Board by failing to furnish in writing a full and complete explanation regarding the
10 matter would be unprofessional conduct and grounds for disciplinary action. Respondent failed
11 to respond.

12 13. On or about March 4, 2009, Arizona Board staff mailed Respondent a second
13 questionnaire with instructions to provide a written explanation and specific court and police
14 records regarding each of her arrests, citations, or charges, by March 25, 2009. Respondent was
15 notified that failure to cooperate with the Arizona Board by failing to furnish in writing a full and
16 complete explanation regarding the matter would be unprofessional conduct and grounds for
17 disciplinary action. Respondent failed to respond.

18 14. The Arizona Board concluded that Respondent's conduct constituted sufficient cause
19 under Arizona law to suspend or revoke her license to practice as a registered nurse in the State of
20 Arizona.

21 PRAYER

22 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this
23 Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

24 1. Revoking or suspending Registered Nurse License Number 275797, issued to Connie
25 Rasmussen Wilkinson, also known as Connie Sue Rasmussen, also known as Connie Sue
26 Hickman;

27 2. Ordering Connie Rasmussen Wilkinson, also known as Connie Sue Rasmussen, also
28 known as Connie Sue Hickman to pay the Board of Registered Nursing the reasonable costs of

1 the investigation and enforcement of this case, pursuant to Business and Professions Code section
2 125.3; and

3 3. Taking such other and further action as deemed necessary and proper.
4
5

6 DATED: August 9, 2011
7

Louise R. Bailey
8 LOUISE R. BAILEY, M.ED., RN
9 Executive Officer
10 Board of Registered Nursing
11 Department of Consumer Affairs
12 State of California
13 *Complainant*
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SF2011900247
90202316.doc